

steppenwolf

January 14, 2015

Chairman Tom Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O'Rielly
c/o Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

THEATER

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STEPPENWOLF.ORG

Re: Comments in ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166 Via Electronic Filing

Dear Chairman Wheeler, Commissioner Clyburn, Commissioner Rosenworcel, Commissioner Pai, Commissioner O'Rielly and Ms. Dortch,

On behalf of Steppenwolf Theatre, located in Chicago, IL that provides approximately 16 plays and 700 performances a year to 200,000 audience members and education programs to 15,000 students, I write with concern about protection for our wireless microphones and backstage communication devices. Steppenwolf Theatre Company is where great acting meets big ideas. Our passion is to tell stories about how we live now. Our mission is to engage audiences in an exchange of ideas that makes us think harder, laugh longer, feel more. Steppenwolf was formed in 1976 by a collective of actors dedicated to an ethic of mutual respect and the development of artists through ongoing group work. The company has grown into an internationally renowned ensemble of 44 actors, directors and playwrights and has received unprecedented national and international recognition,

I understand the Commission has ruled that performing arts entities that regularly use 50 or more wireless devices will be eligible to apply for a Part 74 license. I've also learned that the FCC is seeking Comment on a proposed rule that would prevent performing arts entities using fewer than 50 wireless devices from participating in the database. This would leave my organization without any interference protection mechanism from the many TV Band Devices that may soon flood the market. Frequency coordination with other known wireless microphone users has become common practice, but there is no way to coordinate with TVBD's if you don't know about them.

Thousands of performances are held by professional performing arts organizations each year and the use of wireless microphones is both essential to producing high-quality performances and also mitigates against significant public safety concerns. Professional wireless capability, with successful interference protection, is essential to our sector.

Steppenwolf utilizes multiple wireless devices including; Shure UR4D and UR4D microphones, (J5 and UR2 transmitters) microphones, Shure PSM200 and Seinheiser EW 300 systems for in-ear communications, HME DX210& HME DX200 systems for backstage communications, Listentech LR-400-72 for assisted listening, Motorola CP185 for front of house staff, and 2.4GHz wireless remote controls for lighting console and dimming controls.

Our productions run eight performances a week in each of three theatres. A given performance can utilize anywhere from six to twenty four units. We expect our investment in these devices to last for 10-15 years or more. Our units are analog and make use of multiple channels and bands including VHF (channels 2-13, 54 MHz to 216 MHz) for listening assistance devices as well as Low UHF (channels 14-36, 470 to 608 MHz) and High UHF (channels 38-51, the 600 MHz band, 614 MHz to 698 MHz) for IEMs and microphones. The microphones tune into multiple frequencies (Shure mics 578-638, Seinheiser IEM 626-668, Shure IEM 518-554, Motorola Radios UHF 435-480) and several tune outside the TV bands (Listen Tech system FM freq 72,025-75,950, HME com system 2400 – 2483.5 MHz). In addition to the above listed equipment we supplement our inventory with rented equipment from time to time.

In 2006 we were fortunate to receive a generous in kind donation from Shure, saving us thousands of dollars during the move out of the 700 MHz band. We currently increase and replace this inventory at a cost of \$2-4,000 every few years. To replace our old wireless communication system we spent over \$20,000 which was a substantial investment for us and it took several years to fund.

I appreciate that the Commission has sought Public Comment on these very important issues. Professional performing arts organizations should all have some sort of interference protection. While some entities will be protected by access to the geo-location database, many professional performing arts organizations will not under this plan. Further, I would request that the Commission consider the burden already borne by the performing arts community having so recently vacated the 700 MHz band. I am concerned about the cost of once again replacing my theatre's sound equipment.

Performing arts organizations provide demonstrable service to the public in improving quality of life; preserving our cultural heritage; and in providing education, enlightenment, entertainment. They also contribute to local economies in every community across this country. I respectfully request that the Commission maintain access to interference protection and establish a mechanism to reimburse performing arts organizations for the cost of new equipment.

Sincerely,

A handwritten signature in blue ink, appearing to read 'David Schmitz', with a long, sweeping horizontal line extending to the right.

David Schmitz
Managing Director